

Annual 64.2009(e) CPNI Certification for 2011 covering the prior year 2010

1. Date filed: February 18, 2011
2. Name of company(s) covered by this certification:  
Convergence Technologies Inc.
3. Form 499 Filer ID: NA
4. Name of signatory: James Hom
5. Title of signatory: Project Manager
6. Certification:

I, James Hom, certify that I am a officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's

CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, please provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, please provide a summary of such complaints. This summary should include number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47. C.F.R. S: 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed \_\_\_\_\_ February 18, 2011

James Hom

**Attachment A**  
**Statement Concerning Procedures Ensuring Compliance with CPNI Rules**

The operating procedures of Convergence Technologies Inc ensure that the Company complies with Part 64, section 2001 et.seq of the FCC rules governing the use of CPNI.

CPNI is defined as (A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).

Generally, CPNI includes personal information regarding a consumer's use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a consumer; (b) the telephone numbers calling a customer; (c) the time, location and duration of a consumer's outbound and inbound phone calls, and (d) the telecommunications and information services purchased by a consumer.

Call detail information (also known as "call records") is a category of CPNI that is particularly sensitive from a privacy standpoint and that is sought by pretexters, hackers, and other unauthorized entities for illegitimate purposes. Call detail includes any information that pertains to the transmission of a specific telephone call, including the number called (for outbound calls), the number from which the call was placed (for inbound calls), and the date, time, location and/or duration of the call (for all calls).

Convergence Technologies recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Company.

Convergence Technologies has designated a CPNI compliance supervisor who is responsible for: (1) communicating with the company's attorneys regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of company employees and agents who use or have access to CPNI; (3) supervising the use, disclosure, distribution or access to the company's CPNI by independent contractors and joint venture partners; (4) maintaining records regarding the use of CPNI in marketing campaigns; and (5) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Convergence Technologies Inc has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The supervisor at Convergence Technologies Inc will overlook and ensure that no use of CPNI is made without review of applicable rules and law.

Convergence Technologies Inc trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed

training and understand that any infraction of the CPNI procedures could potentially result in disciplinary action being taken against them.

Convergence Technologies has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

Convergence Technologies maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

Convergence Technologies requires that customer be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit.

Convergence Technologies maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and the supervisor's signature and date. This log is maintained for a minimum of two years.